



February 13, 2014  
Via ECFS Filing

Ms. Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Suite TW-A325  
Washington, DC 20554

**RE: Telephone Associates, Inc. – 499 Filer ID 817174  
CY 2013 Annual CPNI Certification  
EB Docket No. 06-36**

Dear Ms. Dortch:

Attached for filing is the Calendar Year 2013 CPNI Compliance Certification and Statement of CPNI Procedures and Compliance as required by 47 C.F.R. Section 64.2009 (e) submitted on behalf of Telephone Associates, Inc.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3004 or via email to [rnorton@tminc.com](mailto:rnorton@tminc.com). Thank you for your assistance in this matter.

Sincerely,

/s/ Robin Norton

Robin Norton  
Consultant to Telephone Associates, Inc.

cc: Cecily Evans – TelAssociates (via email)  
file: TelAssociates - FCC - CPNI  
tms: FCx1401

Enclosures  
RN/sp

**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

**EB DOCKET 06-36**

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Annual 64.2009(e) CPNI Certification for:	Calendar Year 2013
<b>Name of Company covered by this certification:</b>	<b>Telephone Associates, Inc.</b>
Form 499 Filer ID:	817174
Name of Signatory:	Kevin Hopkins
Title of Signatory:	President

I, Kevin Hopkins, certify and state that:

1. I am the President of Telephone Associates, Inc. ("Company") and, acting as an agent of the Company, that I have personal knowledge that Telephone Associates, Inc. has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*
2. Attached to this certification as Exhibit A, is an accompanying statement explaining how the Company's procedures ensure that the Company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in § 64.2001 *et seq.* of the Commission's rules.
3. The Company has not taken any actions (proceedings instituted or petitions filed by the company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.
4. The Company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.
5. The Company represents and warrants that the above certification is consistent with 47 C.F.R. §1.17 which requires truthful and accurate statements to the Commission. The Company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U. S. Code and may subject it to enforcement action.

  
\_\_\_\_\_  
Kevin Hopkins, President  
Telephone Associates, Inc.

2/11/14  
\_\_\_\_\_  
Date

Exhibit A  
Statement of CPNI Procedures and Compliance

**Telephone Associates, Inc.**

Calendar Year 2013

**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF  
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Telephone Associates, Inc.

Statement of CPNI Procedures and Compliance – Calendar Year 2013

Telephone Associates, Inc. ("Telephone Associates" or "Company") provides local, long distance and Internet access (dial-up and DSL) services to its customers. The Company does not use CPNI for sales and marketing campaigns and has processes in place to ensure that its employees do not improperly use or disclose CPNI. The Company's actions described below are designed to thwart efforts by pretexters to obtain Company customer CPNI.

The Company has a CPNI manual with the rules, requirements and Company processes included. The Company requires that all access to CPNI be approved by a supervisor with knowledge of the FCC's CPNI requirements. Information regarding CPNI, including rules and procedures, are available to Customer Service Representatives, along with training on policies and procedures, to ensure its personnel understand and comply with restrictions regarding the use and disclosure of, and access to, CPNI. Corresponding disciplinary procedures are in place for violations of CPNI disclosure.

All customers in 2013 were provided information regarding CPNI: "Important Message About Your Customer Proprietary Network Information" which requested customers to select a password and a non-biographical verification question. Customers who did not reply and who contact the Company are verified through a call-back to the telephone number of record, or must provide call detail on the telephone call in order for the Company to verify the customer. At that time, a password is set up with the customer.

The Company maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI.

The Company has in place reasonable means to discover and protect against attempts to gain unauthorized access to its customers' CPNI. Telephone Associates has instituted an authentication procedure to safeguard the disclosure of CPNI over the telephone. The Telephone Associates' billing system provides a screen to its Service Representatives which automatically requires the Service Representative to ask for the customer's password. Also, fields have been established in the Service Representative system to document the authenticating backup verification question and answer. There is also a data field for each customer account which lists any changes to access of CPNI information that have occurred as a result of Company/Customer telephone contact or inquiry, such as name, date and password used to access the information, and Service Representative who made the change in the database. Reports can be run on all information in the Company database related to CPNI. Those reports are only provided to Company CPNI officers who have been given security roles.



Telephone Associates, Inc.

Statement of CPNI Procedures and Compliance – Calendar Year 2013  
(Page 2)

The Company requires a password to be provided to verify the customer's identity prior to release of any call detail information over the telephone. Service Representatives are trained not to prompt the customer for needed information. If the customer cannot provide the password, the call detail information will only be sent to the address of record, or the customer can be called back at the telephone number of record on file with the Company.

Further, the Company has established back-up authentication procedures for lost or stolen passwords that do not prompt the customer for readily available biographical information or account information. The back-up authentication procedure requires the customer to determine the Verification Question and Answer.

Should a customer come into the Company office requesting information or wishing to review call detail information, the customer is asked to provide a valid photo ID.

Telephone Associates does not provide for account or call detail information to be accessed via the internet.

The Company has in place procedures to notify law enforcement within seven (7) business days in the event of a breach of customers' CPNI and to ensure that customers are not notified of the breach before the time period set forth in the FCC's rules, or if applicable, when so authorized by law enforcement. The Company maintains a log of all breaches discovered and notifications made to the United States Secret Service (USSS) and the FBI, and to customers.

The Company has not taken any actions against data brokers in the last year.

The Company did not receive any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2013.